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Michael J. Avenatti
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10 **UNITED STATES DISTRICT COURT**
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12 **CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION**

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In re
EAGAN AVENATTI, LLP,
Debtor.

Case No. 8:18-cv-01644-VAP-KES

**LIMITED OBJECTION TO
RECEIVER'S MOTION TO
DISCHARGE RECEIVER [Dkt. No. 106]**

1 **PLEASE TAKE NOTICE** that Mr. Avenatti has no objection to the discharge of the
2 Receiver, but requests that any determination of compensation (or the “reasonableness” of said
3 compensation) to be paid to the Receiver be adjudicated solely by the Bankruptcy Court in light
4 of the recent bankruptcy filing. Mr. Avenatti specifically reserves any and all rights, objections,
5 and/or arguments in opposition to the reasonableness of fees, expenses, and/or compensation
6 sought by the Receiver. Furthermore, Mr. Avenatti objects to the fees requested by the Receiver,
7 as he does not believe the fees (or the attendant services rendered) benefitted the estate.

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9 **SHULMAN BASTIAN LLP**

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11 Dated: October 18, 2019 By: /s/ Ryan D. O'Dea

12 Ryan D. O'Dea
13 Attorneys for Michael J. Avenatti

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1 **PROOF OF SERVICE**

2 **In re Eagan Avenatti, LLP**
3 **8:18-cv-01644-VAP-KES**

4 **STATE OF CALIFORNIA, COUNTY OF ORANGE**

5 At the time of service, I was over 18 years of age and not a party to this action. I am
6 employed in the County of Orange, State of California. My business address is 100 Spectrum Center
7 Drive, Suite 600, Irvine, CA 92618.

8 On October 18, 2019, I served true copies of the following document(s) described as
9 **LIMITED OBJECTION TO RECEIVER'S MOTION TO DISCHARGE RECEIVER [Dkt.**
10 **No. 106]** on the interested parties in this action as follows:

11 **SEE ATTACHED SERVICE LIST**

12 **BY MAIL:** I enclosed the document(s) in a sealed envelope or package addressed to the
13 persons at the addresses listed in the Service List and placed the envelope for collection and mailing,
14 following our ordinary business practices. I am readily familiar with the practice of Shulman
15 Hodges & Bastian LLP for collecting and processing correspondence for mailing. On the same day
16 that correspondence is placed for collection and mailing, it is deposited in the ordinary course of
17 business with the United States Postal Service, in a sealed envelope with postage fully prepaid. I
18 am a resident or employed in the county where the mailing occurred. The envelope was placed in
19 the mail at Irvine, California.

20 **BY CM/ECF NOTICE OF ELECTRONIC FILING:** I electronically filed the
21 document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case who
22 are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who
23 are not registered CM/ECF users will be served by mail or by other means permitted by the court
24 rules.

25 **BY FEDEX:** I enclosed said document(s) in an envelope or package provided by FedEx
26 and addressed to the persons at the addresses listed in the Service List. I placed the envelope or
27 package for collection and overnight delivery at an office or a regularly utilized drop box of FedEx
28 or delivered such document(s) to a courier or driver authorized by FedEx to receive documents.

29 I declare under penalty of perjury under the laws of the United States of America that the
30 foregoing is true and correct and that I am employed in the office of a member of the bar of this
31 Court at whose direction the service was made.

32 Executed on October 18, 2019, at Irvine, California.

33

34 */s/ Lori Gauthier*
35 Lori Gauthier

1 **SERVICE LIST**
2 **In re Eagan Avenatti, LLP**
3 **8:18-cv-01644-VAP-KES**

4 **BY CM/ECF NOTICE OF ELECTRONIC FILING:**

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15 **VIA FIRST-CLASS MAIL:**

16 Chambers of Honorable Karen E Scott
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